

**RECEIVED**

AUG 21 2000

CALFED Bay-Delta Program

DENNIS M. DIEMER
GENERAL MANAGER

August 17, 2000

Steve Ritchie, Acting Executive Director
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

Dear Mr. Ritchie:

Comments on Final EIR/EIS and Record of Decision

The East Bay Municipal Utility District (EBMUD) appreciates the opportunity to comment on the CALFED Final EIR/EIS. This letter contains recommendations for the Record of Decision (ROD)/State Certification and specific comments on the Final EIR/EIS. Additionally, EBMUD has contributed to comments submitted through other stakeholder groups, including the California Urban Water Association (CUWA), the Bay-Delta Urban Coalition and a group of Bay Area agencies. Consistent with comments from these other stakeholder groups, CALFED should identify intermediate water quality milestones to guide its efforts at attaining long-range targets. The annual reports contemplated for each December should address water quality improvements.

The ROD/Certification should specifically reference that the Bay Area Blending investigation will evaluate the American River as a source that could provide water quality benefits to other Bay Area agencies while preserving the instream values of the lower American River. As EBMUD continues to make progress with the negotiations to implement its USBR contract for American River water, it is appropriate to investigate how this project might contribute to a Bay Area blending program that would improve drinking water quality throughout the Bay Area. This project would still be subject to additional NEPA and CEQA project-specific analyses if the evaluation showed it to be among the most promising options that could benefit multiple regions, consistent with CALFED's solution principles. As noted in the CALFED Framework Agreement of June 9th, this work must be carried out on a voluntary, consensual basis to be successful without harming public trust resources or water rights.

The Drinking Water Improvement Strategy which encompasses source protection, treatment technology evaluations, system operation studies, and both the Bay Area Blending investigation outlined above and the Southern California MWD-Friant exchange should be a high priority in terms of funding and implementation. Adequate supplies of high quality water for both the environment and economy are vital.

The Specific Comments of EBMUD on the Final EIS/EIR are described in Attachment 1 of this letter. EBMUD is pleased with CALFED's commitment that satisfactory resolution of fishery concerns is a prerequisite to implementing a new Sacramento River

375 ELEVENTH STREET . OAKLAND . CA 94607-4240 . (510) 287-0101
BOARD OF DIRECTORS JOHN A. COLEMAN . KATY FOULKES . LESA R. MCINTOSH
FRANK MELLON . WILLIAM B. PATTERSON . DAVID RICHARDSON . DANNY W. WAN

Recycled Paper

C - 1 1 4 4 3 3

C-114433

Mr. Steve Ritchie
Final EIR/EIS Comments
August 17, 2000
Page 2

to Mokelumne River facility. The ROD/Certification should clearly articulate this condition and apply it specifically to both Sacramento River and Mokelumne River origin fish. We are confident that CALFED would not want to jeopardize the successful restoration program that EBMUD has helped to implement on the Mokelumne River.

EBMUD remains committed to assisting CALFED during implementation of the various CALFED actions affecting EBMUD interests, including Bay Area blending, the watershed program, levee program, ecosystem restoration, Environmental Water Account, and Water Use Efficiency Program. If you have any questions or concerns about these comments please contact Mr. Randeke Kanouse at (916) 443-6948.

Sincerely,



Dennis M. Diemer
General Manager

DMD:RK:BC

Attachment

cc: Lester Snow
Regional Director
U.S Bureau of Reclamation
2800 Cottage Way
Sacramento, CA 95825